

Exhibit E

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

Civil Action No.: 01CV10194DPW

5 STEPHEN KEEFE,

6 Plaintiff,

7 vs.

8 LOCAL 805, INTERNATIONAL

9 LONGSHOREMEN'S ASSOCIATION, AFL-CIO,

10 LOCAL 800, INTERNATIONAL

11 LONGSHOREMEN'S ASSOCIATION, AFL-CIO,

12 and LOCAL 799, INTERNATIONAL

13 LONGSHOREMEN'S ASSOCIATION, AFL-CIO,

14 Defendants.

15 DEPOSITION OF STEPHEN KEEFE, a witness

16 called on behalf of the Defendant pursuant to the

17 Massachusetts Rules of Civil Procedure, before

18 Mary P. Peacock, Professional Shorthand Reporter and

19 Notary Public in and for the Commonwealth of

20 Massachusetts at the offices of Angoff, Goldman,

21 Manning, Wanger & Hynes 24 School Street, Boston,

22 Massachusetts, on February 6, 2002, commen-

23 10:05 a.m.



O'Brien & Levine

1287 Commonwealth Ave. (888) 825-DEPO Boston, MA

1 Q. Who told you to go to Mr. Horohoe to obtain that
2 letter?

3 MR. LATHROP: Objection to the form.

4 A. I don't remember who told me to.

5 Q. Did someone tell you to get the letter?

6 A. I don't remember.

7 Q. But in fact on May 24 you were working as a
8 longshoreman and also doing other work for John T.
9 Clark, isn't that true?

10 A. Yes.

11 Q. Are you still doing work for John T. Clark other than
12 longshore work?

13 A. No.

14 Q. Mr. Keefe, I show you a document dated May 25th,
15 2000. Is that your signature?

16 A. Yes.

17 Q. And did you date the document?

18 A. Yes.

19 Q. On May 25th, 2000?

20 A. Yes.

21 Q. And that's the Hiring Hall certification?

22 A. Yes.

23 Q. And it's -- it states that, "I pledge on my honor
24 that I am available on a full-time basis and working